



IMPORTANT – THIS COMMUNICATION AFFECTS YOUR PROPERTY

COUNCIL OF THE ISLES OF SCILLY

Town Hall, St Mary's TR21 0LW
Telephone: 01720 424455 – Email: planning@scilly.gov.uk

Town and Country Planning Act 1990
Town and Country Planning (Development Management Procedure) Order 2015

PERMISSION FOR DEVELOPMENT

Application No: P/23/056/HH **Date Application Registered:** 7th August 2023

Applicant: Mr Perry Sladen
Camelia
Holy Vale
St Mary's
Isles of Scilly
TR21 0NT

Site address: Camelia Holy Vale St Mary's Isles of Scilly TR21 0NT
Proposal: Installation of 3 velux type roof lights in south facing roof.

In pursuance of their powers under the above Act, the Council hereby **PERMIT** the above development to be carried out in accordance with the following Conditions:

C1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In accordance with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

C2 The development hereby permitted shall be carried out in accordance with the approved details only including:

- **Plan 1 Location Plan drawing reference TQRQM23216181108750, date stamped 7th August 2023**
- **Plan 2 Block Plan, drawing reference TQRQM23216180531519, date stamped 7th August 2023**
- **Plan 3 Proposed South Elevation CORRECTED, drawing number PS23-02, date stamped 16th October 2023**
- **Plan 4 Proposed Roof Plan CORRECTED, drawing number PS23-04, date stamped 16th October 2023**
- **Plan 5 Design & Access Statement, date stamped 7th August 2023**
- **Plan 6 Primary Roost Assessment, Ref: 23-5-3 dated 27th June 2023**
- **Plan 7 Bat Presence/Absence Survey Ref: 23-6-3 dated 26th July 2023 (Chapter 4 Mitigation Strategy)**

These are stamped as APPROVED

Reason: For the clarity and avoidance of doubt and in the interests of the character and appearance of the Conservation Area, Area of Outstanding Natural Beauty and Heritage Coast in accordance with Policy OE1, OE2, OE7, SS1(d) and SS2(g) of the Isles of Scilly Local Plan (2015-2030).

C3 No construction plant and/or machinery shall be operated on the premises, as part of the implementation of this permission, before 0800 hours on Mondays through to Saturdays nor

after 1800 hours. There shall be no works involving construction plant and/or machinery on a Sunday or Public or Bank Holiday.

Reason: In the interests of protecting the residential amenities of the islands.

Further Information

1. In dealing with this application, the Council of the Isles of Scilly has actively sought to work with the applicants in a positive and proactive manner, in accordance with paragraph 38 the National Planning Policy Framework 2021.
2. In accordance with the provisions of Section 96A of the Town and Country Planning Act which came into force on 1st October 2009, any amendments to the approved plans will require either a formal application for a non-material amendment or the submission of a full planning application for a revised scheme. If the proposal relates to a Listed Building you will not be able to apply for a non-material amendment and a new application for a revised scheme will be required. Please discuss any proposed amendments with the Planning Officer. There is a fee to apply for a non-material amendment and the most up to date fee will be charged which can be checked here: https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf
3. In accordance with the Town and Country Planning (fees for Application and Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2017 a fee is payable to discharge any condition(s) on this planning permission. The fee is current £34 for each request to discharge condition(s) where the planning permission relates to a householder application. The fee is payable for each individual request made to the Local Planning Authority. You are advised to check the latest fee schedule at the time of making an application as any adjustments including increases will be applied: https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf
4. The Applicant is reminded of the provisions of the Wildlife and Countryside Act 1981 and the E.C. Conservation (Natural Habitats) Regulations Act 1994, the Habitat and Species Regulations 2012 and our Natural and Environment and Rural Communities biodiversity duty. This planning permission does not absolve the applicant from complying with the relevant law protecting species, including obtaining and complying with the terms and conditions of any licences required, as described in part IV B of Circular 06/2005. Care should be taken during the work and if bats are discovered, they should not be handled, work must stop immediately and a bat warden contacted. Extra care should be taken during the work, especially when alterations are carried out to buildings if fascia boards are removed as roosting bats could be found in these areas. If bats are found to be present during work, they must not be handled. Work must stop immediately and advice sought from licensed bat wardens. Call The Bat Conservation Trust's National Bat Helpline on 0845 1300 228 or Natural England (01872 245045) for advice.
5. This decision is not a determination under the Building Regulations. Please ensure that all building works accord with the Building Regulations and that all appropriate approvals are in place for each stage of the build project. You can contact Building Control for further advice or to make a building control application: buildingcontrol@cornwall.gov.uk.

Signed: 

Chief Planning Officer

Duly Authorised Officer of the Council to make and issue Planning Decisions on behalf of the Council of the Isles of Scilly.

DATE OF ISSUE: 16th October 2023



COUNCIL OF THE ISLES OF SCILLY

Planning Department
Town Hall, The Parade, St Mary's, Isles of Scilly, TR21 0LW
☎0300 1234 105
✉planning@scilly.gov.uk

Dear Mr Perry Sladen

Please sign and complete this certificate.

This is to certify that decision notice: P/23/056/HH and the accompanying conditions have been read and understood by the applicant: Mr Perry Sladen.

1. **I/we intend to commence the development as approved:** Installation of 3 velux type roof lights in south facing roof at: Camelia Holy Vale St Mary's Isles Of Scilly TR21 0NT
on:.....
2. I am/we are aware of any conditions that need to be discharged before works commence.
3. I/we will notify the Planning Department in advance of commencement in order that any pre-commencement conditions can be discharged.

You are advised to note that Officers of the Local Planning Authority may inspect the project both during construction, on a spot-check basis, and once completed, to ensure that the proposal has complied with the approved plans and conditions. In the event that the site is found to be inaccessible then you are asked to provide contact details of the applicant/agent/contractor (delete as appropriate):

Name: _____ **Contact Telephone Number:** _____
And/Or Email: _____

Print Name:.....

Signed:.....

Date:.....

Please sign and return to the **above address** as soon as possible.



COUNCIL OF THE ISLES OF SCILLY

Planning Department

Town Hall, St Mary's, Isles of Scilly, TR21 0LW

☎ 01720 424455

✉ planning@scilly.gov.uk

**THIS LETTER CONTAINS IMPORTANT INFORMATION
REGARDING YOUR PERMISSION – PLEASE READ
IF YOU ARE AN AGENT DEALING WITH IS ON BEHALF OF THE
APPLICANT IT IS IMPORTANT TO LET THE APPLICANT KNOW
OF ANY PRE-COMMENCEMENT CONDITIONS**

Dear Applicant,

This letter is intended to help you advance your project through the development process. Now that you have been granted permission, there may be further tasks you need to complete. Some aspects may not apply to your development; however, your attention is drawn to the following paragraphs, which provide advice on a range of matters including how to carry out your development and how to appeal against the decision made by the Local Planning Authority (LPA).

Carrying out the Development in Accordance with the Approved Plans

You must carry out your development in accordance with the stamped plans enclosed with this letter. Failure to do so may result in enforcement action being taken by the LPA and any un-authorized work carried out may have to be amended or removed from the site.

Discharging Conditions

Some conditions on the attached decision notice will need to be formally discharged by the LPA. In particular, any condition that needs to be carried out prior to development taking place, such as a 'source and disposal of materials' condition, an 'archaeological' condition or 'landscaping' condition must be formally discharged prior to the implementation of the planning permission. In the case of an archaeological condition, please contact the Planning Department for advice on the steps required. Whilst you do not need to formally discharge every condition on the decision notice, it is important you inform the Planning Department when the condition advises you to do so before you commence the implementation of this permission. Although we will aim to deal with any application to discharge conditions as expeditiously as possible, you are reminded to allow up to **8 weeks** for the discharge of conditions process.

Please inform the Planning Department when your development or works will be commencing. This will enable the Council to monitor the discharge and compliance with conditions and provide guidance as necessary. We will not be able to provide you with any written confirmation on the discharge of pre-commencement conditions if you do not formally apply to discharge the conditions before you start works.

As with the rest of the planning application fees, central Government sets a fee within the same set of regulations for the formal discharge of conditions attached to planning permissions. Conditions are necessary to control approved works and development. Requests for confirmation that one or more planning conditions have been complied with are as follows (VAT is not payable on fees set by central government). More information can be found on the Council's website:

- Householder permissions - £34 per application
- Other permissions - £116 per application

Amendments

If you require a change to the development, contact the LPA to see if you can make a 'non material amendment' (NMA). NMA can only be made to planning permissions and not a listed building consent. They were introduced by the Government to reflect the fact that some schemes may need to change during the construction phase. The process involves a short application form and a 14 day consultation period. There is a fee of £34 for householder type applications and £234 in all other cases. The NMA should be determined within 28 days. If the change to your proposal is not considered to be non-material or minor, then you would need to submit a new planning application to reflect those changes. Please contact the Planning Department for more information on what level of amendment would be considered non-material if necessary.

Appealing Against the Decision

If you are aggrieved by any of the planning conditions attached to your decision notice, you can appeal to have specific conditions lifted or modified by the Secretary of State. All appeal decisions are considered by the Planning Inspectorate – a government department aimed at providing an unbiased judgement on a planning application. From the date of the decision notice attached you must lodge an appeal within the following time periods:

- Householder Application - 12 weeks
- Planning Application – 6 months
- Listed Building Consent – 6 months
- Advertisement Consent - 8 weeks
- Minor Commercial Application - 12 weeks
- Lawful Development Certificate – None (unless for LBC – 6 months)
- Other Types - 6 months

Note that these periods can change so you should check with the Planning Inspectorate for the most up to date list. You can apply to the Secretary of State to extend this period, although this will only be allowed in exceptional circumstances.

You find more information on appeal types including how to submit an appeal to the Planning Inspectorate by visiting <https://www.gov.uk/topic/planning-development/planning-permission-appeals> or you can obtain hard copy appeal forms by calling 0303 444 5000.

Current appeal handling times can be found at: [Appeals: How long they take page](#).

Building Regulations

With all building work, the owner of the property is responsible for meeting the relevant Planning and Building Regulations. Building Regulations apply to most building work so it is important to find out if you need permission. This consent is to ensure the safety of people in and around buildings in relation to structure, access, fire safety, infrastructure and appropriate insulation.

The Building Control function is carried out on behalf of the Council of the Isles of Scilly by Cornwall Council. All enquiries and Building Control applications should be made direct to Cornwall Council, via the following link [Cornwall Council](#). This link also contains comprehensive information to assist you with all of your Building Control needs.

Building Control can be contacted via telephone by calling 01872 224792 (Option 1), via email buildingcontrol@cornwall.gov.uk or by post at:

Building Control
Cornwall Council
Pydar House
Pydar Street
Truro
Cornwall
TR1 1XU

Inspection Requests can also be made online: <https://www.cornwall.gov.uk/planning-and-building-control/building-control/book-an-inspection/>

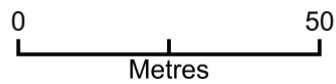
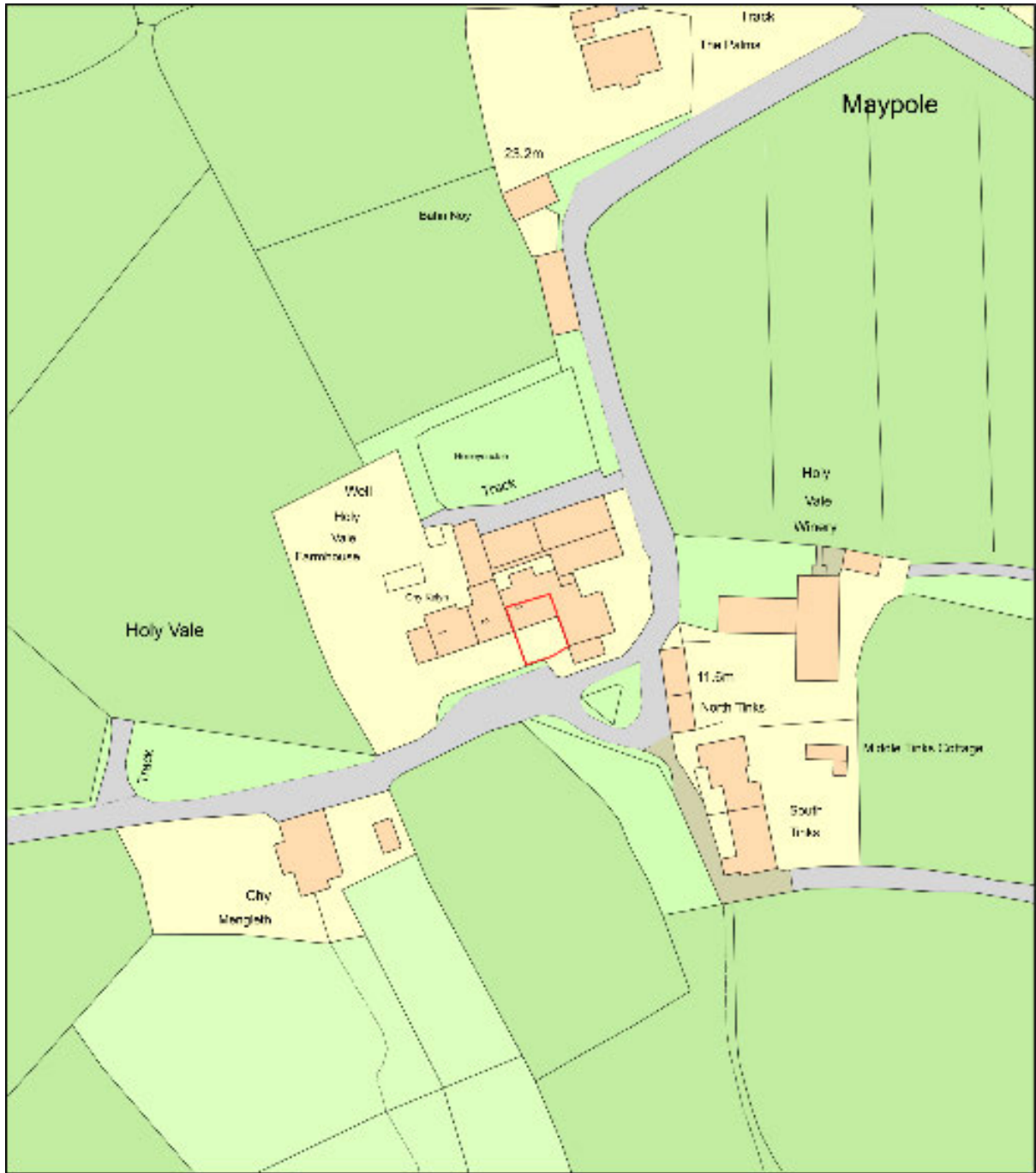
Registering/Altering Addresses

If you are building a new dwelling, sub dividing a dwelling into flats or need to change your address, please contact the Planning Department who will be able to make alterations to local and national databases and ensure postcodes are allocated.

Connections to Utilities

If you require a connection to utilities such as water and sewerage, you will need to contact South West Water on 08000831821. Electricity connections are made by Western Power Distribution who can be contacted on 08456012989.

Should you require any further advice regarding any part of your development, please contact the Planning Department and we will be happy to help you.



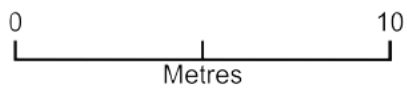
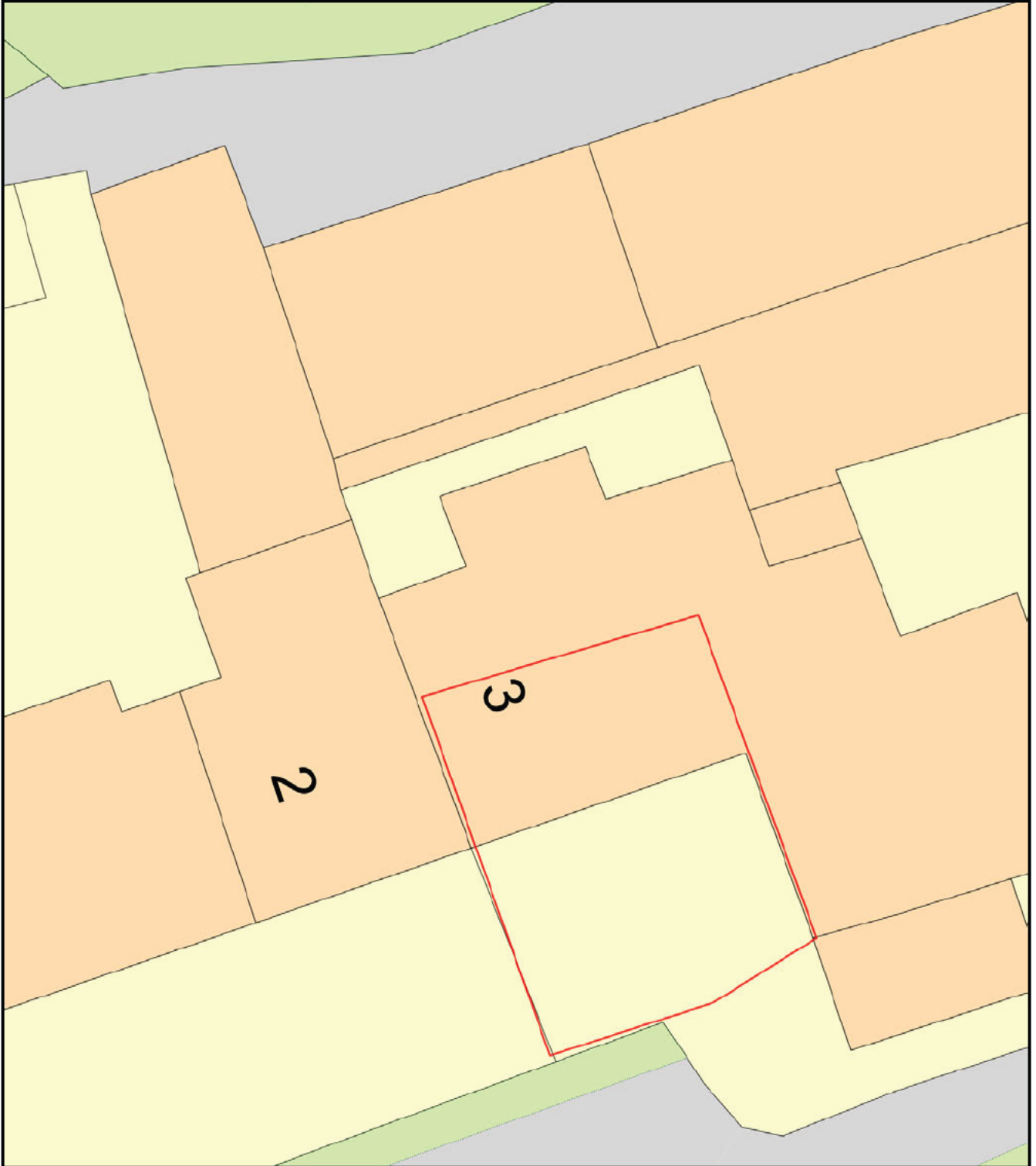
Plan Produced for: Date Produced:

Plan Reference Number: Scale:

IOS Planning Office 04 Aug 2023

TQRQM23216181108750 1:1250 @ A4

camelia 1:200



Plan Produced for: IOS Planning Office
Date Produced: 04 Aug 2023
Plan Reference Number: TQRQM23216180531519
Scale: 1:200 @ A4



PROPOSED INSTALLATION OF 3NO. CONSERVATION ROOF LIGHTS

use only noted dimensions
DO NOT SCALE

DATE SCALE DRAWN
11/10/23 1:50 TT

DRAWING TITLE

Proposed south elevation

Drawing Number: PS23-02/B

STATUS: Planning

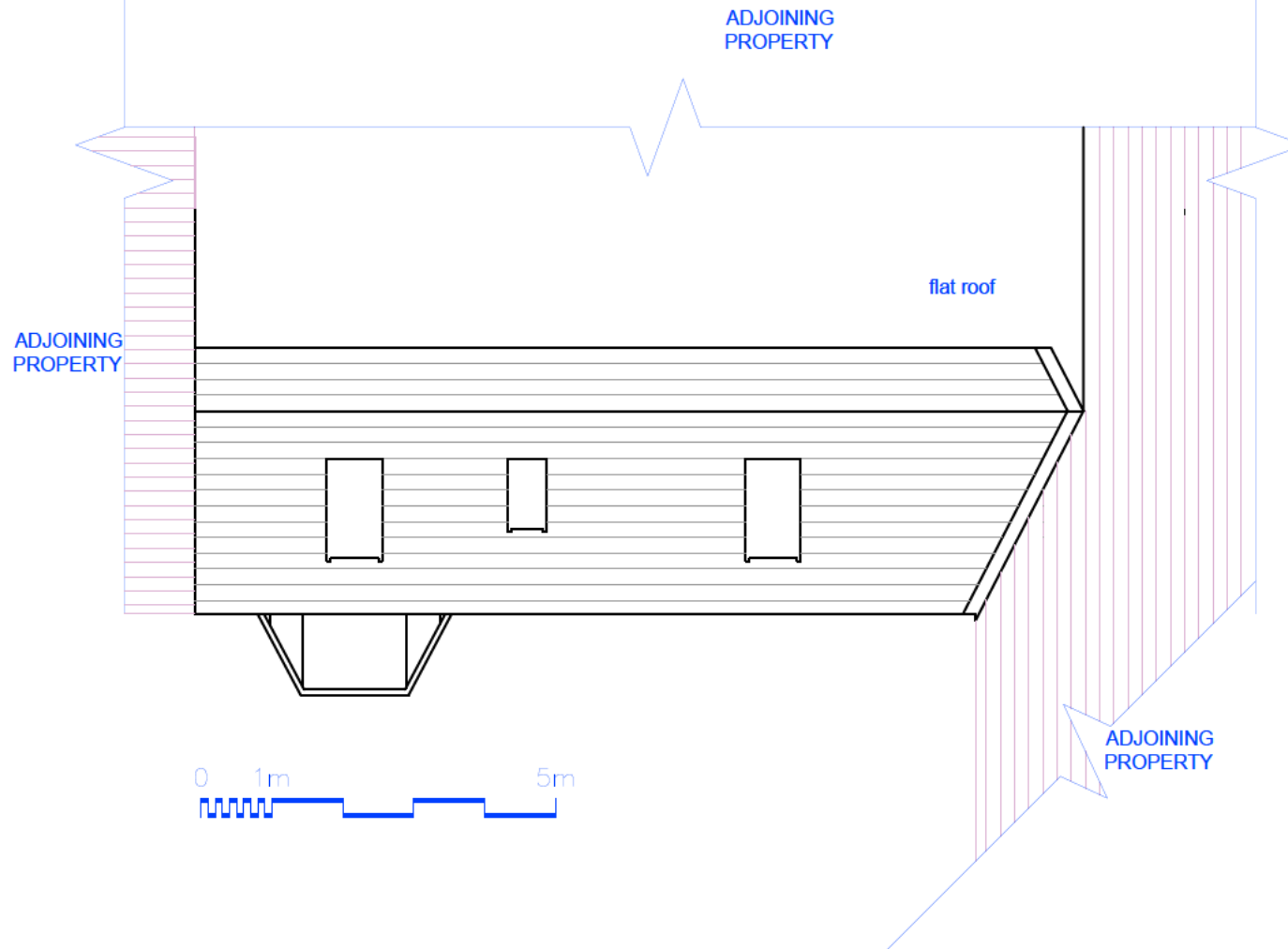
CLIENT
Mr & Mrs P Sladen

SITE ADDRESS
Camelia Cottage
Holy Vale
St Mary's
TR21 0NT

Front elevation as proposed

Scale 1:50

PROPOSED ROOF PLAN



PROPOSED INSTALLATION OF 3NO.
CONSERVATION ROOF LIGHTS

DATE	SCALE	DRAWN
11/10/23	1:100	TT

DRAWING TITLE
Proposed roof plan

Drawing Number PS23-04/B

STATUS Planning

CLIENT
Mr & Mrs P Sladen

SITE ADDRESS
Camelia Cottage
Holy Vale
St Mary's
TR21 0NT

Design and Access Statement

Application to Install 3no Conservation style Roof Lights in the South facing elevation of Camelia Cottage Holy Vale

This application is to install three roof lights into the slate roof reinstating natural light to the second floor. Camelia Cottage is part of a granite terraced building at the rear and to the west of Holy Vale Farm house and adjacent to the recently converted Holy Vale Barns and Greenhouse which have also utilised conservation roof lights in their conversion from agricultural buildings. The roof windows will be flush with the slope of the roof, are black framed and designed to be in keeping with the style of the slate terraced roof in a similar way to the west facing roof light on the adjoining slate roofed property to the east of Camelia. The roof lights are proposed to restore natural light to a second floor which has evidence of previous dormers that were subsequently roofed over during a re-roofing believed to have been over 40 years ago.

Photos of existing roofed over windows to be re-instated with Velux style roof lights



Waste Management

The windows to be installed will be 2x 780mmx1400mm and 1x 550mmx980mm. They are timber framed with aluminium flashings. The glazing is double glazed glass with argon filling. They will be supplied by Rooflite, a sister brand to Velux. They will be delivered to Penzance and then transported to the islands by freight ship via the Steamship Company.

The installation of the dormers will create very little waste. Approximately 1.7 square metres of tiles will be removed. Slate tiles that are removed will be crushed on site and re used as garden mulch at the beginning of the next growing season 2024. Any pieces of timber removed will be re used in the re modeling of the interior rooms which is due to complete by January 2024. Small amounts (around 1.7 square metres) of removed roofing felt will be either re used to

create the bat roost specified in the PAS survey or taken by myself in my vehicle to the Recycling Centre at Porthmellon, this will be done by January 2024.

Sustainable Design

The windows are manufactured to be highly energy saving from double glazed glass providing high thermal insulation parameters of $U_w = 1.3 \text{ W/m}^2\text{K}$. They are also resistant to the most adverse weather conditions, including heavy rain and strong winds. The toughened outer pane is resistant to hail and branches.

PRELIMINARY ROOST ASSESSMENT (PRA)

CAMELIA COTTAGE, HOLY VALE, ST MARY'S, ISLES OF SCILLY



Client: Perry Sladen

Our reference: 23-5-3

Planning reference: Produced in advance of submission

Report date: 27th June 2023

Author: James Faulconbridge BSc (Hons), MRes, MCIEEM

Contact: ios.ecology@gmail.com

Executive Summary

Bats - Results and Findings

The preliminary roost assessment (PRA) survey confirmed the presence of brown long-eared bat droppings in the loft space. The age and number of droppings would be consistent with a small day or night roost; however the potential for either lower-level exploratory use or the presence of a more significant roost cannot be ruled out due to the constraints and limitations of access and visibility. Further surveys would therefore be required to characterise the roost and the use of the building by bats.

This judgement was reached in accordance with the survey methodologies and evaluation criteria outlined in the Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition¹

Bats - Further Survey Requirements

Further surveys would be required in order to characterise the roost. At a minimum, these would include:

- 1) Passive recording of bats within the loft space in June using a static monitoring device;
- 2) Two further Presence/Absence Surveys (PAS) to watch for bats entering/leaving the building;
- 3) An inspection of the loft space of the adjacent Magnolia Cottage to ensure any impacts arising to roosts as a result of works to the party wall are characterised. An explanation and justification for this final recommendation is provided in detail in the following report.

Nesting Birds - Results and Findings

Sparrows were confirmed nesting at the eaves of the building and additional minor niches may occur elsewhere within the roof structure. Adjacent vegetation within the garden may also provide nesting habitat, and may be disturbed as a result of the proposed works.

Nesting Birds - Recommendations

Works should take place with due regard to the presence of nesting birds – no further surveys are required to inform Planning but works should be timed to avoid the nesting season or include pre-commencement inspections.

Nesting opportunities could be retained or re-created in situ. Alternatively, nest boxes could be erected either on the dwelling or within the garden to replace nesting habitats impacted by the re-roofing works. Guidance on suitable specifications is provided.

¹ Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

PRELIMINARY ROOST ASSESSMENT (PRA)

Planning Authority: Isles of Scilly	Location: SV 91985 11543	Planning Application ref: Report produced in advance of submission
Planning application address: Camelia Cottage, Holy Vale, St Mary's, Isles of Scilly		
Proposed development: The proposed works were identified by the client and should accord with the documentation submitted in support of the application. These involve: 1) The installation of Velux windows into the southern pitch of the roof. The following assessment takes into account both the potential direct impacts to the structure (e.g. removal of the existing roof tiles and installation of Velux windows) and the indirect impacts (e.g. changes to the internal condition of the roof void through lighting). The proposals also include works to convert the loft to a living space – these works are not covered by the planning application as they are restricted to internal re-modelling; however the planning process is only a mechanism for ensuring legislative compliance. The legislation protecting bats and their roosts is absolute, regardless of the requirement for planning, and therefore the works to remodel the roof space, beyond the installation of the Velux windows, are also given consideration in the determination of the following survey programme, in order to fully characterise the impacts to roosting bats and ensure that the works can take place with due regard to the legal protection of bats. This is to ensure both the homeowner and their contractors are working safely and with legislative compliance.		
Building references: The building is identified in the plans provided in Appendix 2.		
Name and licence number of bat-workers carrying out survey: James Faulconbridge (2015-12724-CLS-CLS)		
Preliminary Roost Assessment date: The visual inspection was undertaken on 1 st June 2023 in accordance with relevant Best Practice methodology ² .		
Local and Landscape Setting: The building is located in Holy Vale towards the centre of St Mary's. The property is a part of a small settlement including several older cottages as well as newer barn conversions and detached dwellings. These are interspersed with trees, gardens and areas of green space which constitute the immediate surroundings for the property. The land use to the north, east and west is predominantly arable and horticultural, with small fields well-connected by hedge and treelines which would provide good quality foraging and commuting habitat. The cottage is situated at the tip of a wooded belt which runs south towards Higher Moors SSSI. The location of the property is therefore situated optimally for immediate		

² Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

access to the highest quality foraging habitat found on St Mary's.

There are nine records of bat roosts within 500m of the property – these are predominantly common pipistrelle roosts associated with roosting features around fascias on granite buildings or agricultural barns. There is also a single record of a brown long-eared roost within an elm tree in the woodland to the south of the property. This congregation of roosts supports the assessment of Holy Vale as a high value habitat for bats within St Mary's.

Building Description(s):

The property is a granite-built mid-terrace cottage. There are well-fitted timber window and door frames in concrete surrounds – these did not offer gaps or other opportunities which could be used by roosting bats.

The rear of the property to the north has a flat-roof extension built into the roof which encloses the old pitch on the northern aspect. Within the loft space, the remnants of the chimney and stripped roof can be seen on this aspect. The internal rooms and living space within this flat-roof component of the building are not a part of Camelia Cottage site but part of a neighbouring property.

The loft space is under-boarded and clad loosely with timbers in a poor structural condition. In places this restricts visibility of the ridge and roof especially towards the apex, though a void above the cladding is present. Roofing felt is present throughout, though in variable condition. There is evidence of redundant dormers and roof-lights within the timber roof structure, though these have been boarded out and removed from the standard pitched roof – it is understood that this was undertaken as part of a previous re-roofing and reformatting project. There is little or no insulation present. The space has evidently been used as living space in the past but was dusty and dirty at the time of survey with no use for storage or other purposes. No gaps suitable to provide roosting opportunities were noted between timbers though occasional minor cavities may occur – there is potential for bats to free-hang from timbers. The irregular nature of the roof and the inclusion of the redundant exterior wall, capped chimney and roof pitch precluded comprehensive access for inspection.

A small number of individual droppings were noted in the western edge of the loft space – these are largely rat and mouse though a dropping caught in a spider's web above was sent for DNA analysis and was confirmed as brown long-eared bat (see Appendix 1). The droppings were not fresh, but are likely to be from the 2023 active season. As a precautionary assessment, it is likely that at least 5-6 droppings within this location are brown long-eared bat based on this analysis, indicating an occasional day- or night-roost. However the location of the droppings is below a gap in the timber clad component of the loft and it is possible that the droppings identified may be from a larger roost concealed at the ridge, from which just a small number of dropping have fallen to a visible location and are thus apparent. For this reason, further surveys would be required to characterise the roost based on these limitations on inspection, assessment and interpretation.

Externally, the roof is in good condition with few gaps between roof or ridge tiles. There is abundant moss on the southern pitch which further acts to seal any minor gaps which may occur. No fascias or soffits are present – the guttering is attached directly to the granite wall at a height which would restrict a direct fly-in for roosting bats but would nonetheless permit access. The proximity to a tree with a large canopy would provide a covered/vegetated access point.

It was not possible to inspect the flat-roof component on the northern aspect or the main pitch into which it ties due to intervening buildings under alternate ownership. No direct or indirect impacts to this structure are identified based on the proposals under consideration, though this may represent a potential access point for bats.

The cottage and thus the roof void is part of a terrace and there are party walls between

Camelia Cottage's loft and the loft spaces of the neighbouring properties on both sides. These appeared to be generally well-sealed with no direct fly-through access for bats, though minor gaps over the concrete block wall connecting to Magnolia Cottage may occur.

Sparrows were confirmed nesting at the eaves of the roof, and a mature tree in the neighbouring garden is set in close proximity to the property and is likely to provide further nesting habitat.

Survey Limitations

The irregular nature of the loft space, incorporating enclosed and abandoned elements of a previous structure, precluded comprehensive access though all areas of the loft space were visually inspected from a distance. This is taken into account in the assessment and recommendations provided.

The timber cladding would conceal evidence of bats roosting between the timbers and the roof structure above. The location of the confirmed dropping below a gap in the timber cladding would not preclude the possibility that the small number of droppings relate to a larger roost from which only a small proportion of droppings are apparent in the accessible space. This possibility would need to be assessed through further surveys which use alternative techniques to overcome the limitation.

It was not possible to view the northern pitch of the roof due to the presence of the flat-roof extension belonging to a neighbouring property. No direct or indirect impacts to this side of the roof are proposed, so this constraint is relevant only to the potential for bats to use this aspect to access roosting locations within the loft space. The significance of this limitation will depend on the results of the further PAS surveys undertaken on the southern side of the building.

No further constraints to the validity of the survey are recorded.

Assessment of Potential for use by Roosting Bats

The identification of bat droppings within the loft space confirm that brown long-eared bats have accessed the roof space.

- The evidence gathered from the PRA inspection would be consistent with a small day- or night-roost by an individual brown long-eared bat.

The potential for a lower or higher status of use cannot be ruled out however, based on the evidence gathered to date. This could include:

- Exploratory access only by a brown long-eared bat which does not use the building as a regular roost; or
- A more significant roost, including maternity, used by a larger number of bats.

Further surveys would therefore be required to characterise the use of the loft space by brown long-eared bats.

Conservation Significance (Bats)

The conservation significance of the roost can be characterised by considering both the species of bat, and the type of roost. Further information would be required to characterise the type of roost, but brown long-eared bats are considered to be rare on the Isles of Scilly, thus elevating the conservation significance of the roost.

Only two roost sites for brown long-eared bat are known on St Mary's – these are both tree roosts used by individual bats. Brown long-eared bats have not been identified on St Mary's for over 10 years and this DNA analysis of a recent dropping allows their continued presence to be confirmed. More recent roosts have been confirmed on Tresco – these two islands are the only

places known to support brown long-eared bats on Scilly.

Recommendations and Justification (Bats):

Additional surveys would be required to characterise the use of the loft space by brown long-eared bats.

The proposals of direct consideration to Planning are restricted to the installation of the Velux windows; these would have the effect of increasing light levels in the loft space which would functionally destroy a roost in isolation. For this reason, further surveys to characterise the use of the loft space by bats would be required even if the precise location of the physical intervention to the roof structure was not used as the roosting site.

The proposals also include works to convert the loft to a living space – these works are not covered by the planning application as they are restricted to internal re-modelling; however the planning process is only a mechanism for ensuring legislative compliance. The legislation protecting bats and their roosts is absolute, regardless of the requirement for planning, and therefore the works to remodel the roof space, beyond the installation of the Velux windows, are also given consideration in the determination of the following survey programme, in order to fully characterise the impacts to roosting bats and ensure that the works can take place with due regard to the legal protection of bats. This is to ensure both the homeowner and their contractors are working safely and with legislative compliance.

- A static bat detector should be deployed in the loft space to determine use of the void over a period of several weeks in June. As brown long-eared bats have quiet echolocation, this approach is not comprehensive and must be deployed alongside emergence surveys but may provide valuable additional evidence upon which to base the assessment;
- A minimum of two Presence/Absence Surveys (PAS) should be undertaken to observe the building at dusk/dawn and watch for bats emerging from, or returning to, roost sites from the roof. The layout of the building would only permit this to be undertaken from the southern aspect.
- An additional inspection of the loft space in Magnolia Cottage should be undertaken, to ensure that remodelling works affecting the party wall in the loft space of Camelia Cottage do not impact upon roosting features.

The results of these surveys would then be used to develop mitigation recommendations to ensure legislative compliance.

Assessment of Potential for use by Nesting Birds

House sparrows were confirmed nesting in features associated with the eaves of the property. Further minor opportunities may also be found elsewhere within the structure.

The property is set within a garden including a mature tree in the adjacent property – these may provide suitable nesting habitat for birds which could be disturbed during works, for example through the erection of scaffolding and the removal of tiles.

It is confirmed that the building and associated vegetation provides **suitable habitat** for use by nesting birds.

Recommendations and Justification (Birds):

In order to ensure legislative compliance, the contractors undertaking the works must ensure that nesting birds are not disturbed in accordance with requirements under the Wildlife and Countryside Act (1981).

Timing of Works

Works affecting the roof should be undertaken outside of the breeding season which runs from March – September inclusive, where practicable. This would provide the most robust means of avoiding risk of impact to nesting birds.

Pre-commencement Inspection

If this is not possible, then contractors should visually inspect the work area internally and externally before they are affected by the works, in order to confirm that no nests are present. In the event that a bird's nest is present, it must be left undisturbed until chicks have fledged the nest, at which point works can proceed.

Care must also be taken to ensure that the works do not cause disturbance or damage to proximate nesting areas through indirect impacts including vibration, noise or contractor presence. This includes adjacent parts of the building, as well as vegetation within the garden and boundary hedges.

Enhancement Opportunities

The proposed works are likely to involve the removal of nesting habitats for sparrows at the eaves, in the absence of appropriate mitigation measures. It is recommended that retention in situ is designed into the scheme where practicable. Alternatively the installation of communal nest boxes supporting several pairs of birds could ensure continuity of nesting habitat. Consideration would need to be given to the location and aspect of these boxes to minimise disturbance and risk of predation, as well as avoid nuisance to residents.

If the applicant wished to provide biodiversity enhancement measures, this could be achieved through the erection of further bird boxes on the building. Nest boxes suitable for hole-dwelling species such as blue tits, or open-fronted boxes for species such as blackbird and robin also have a high likelihood of occupation.

Boxes should be mounted on the wall if possible, at a height of at least 3m above the ground with an entrance clear of vegetation/other features which may put them at risk of predation from cats.

Boxes can be sourced online, or can be constructed on site using methodology and specifications provided by the RSPB:

Swallow: <https://www.nestbox.co.uk/products/eco-swallow-nest>

Sparrows: <https://www.rspb.org.uk/get-involved/activities/give-nature-a-home-in-your-garden/garden-activities/createasparrowstreet/>

Other Species: <https://www.rspb.org.uk/fun-and-learning/for-families/family-wild-challenge/activities/build-a-birdbox/>

Signed by bat worker(s):

Date: 27th June 2023



APPENDIX 1



Folio No: E17887
Report No: 1
Purchase Order: CAMELIA
Client: IOS Ecology
Contact: James Faulconbridge

TECHNICAL REPORT

ANALYSIS OF BAT DROPPINGS FOR SPECIES OF ORIGIN IDENTIFICATION

SUMMARY

The droppings of bats contain small amounts of DNA belonging to the organism from which they originated. By analysing droppings collected from a bat roost or colony for the presence of DNA, a robust identification of the species present can be made. Recent advancements in molecular methods including PCR (polymerase chain reaction) and DNA sequencing mean that 92% of bat species worldwide can be identified including all 17 UK resident bat species.

RESULTS

Date sample received at Laboratory: 08/06/2023
Date Reported: 20/06/2023
Matters Affecting Results: None

Lab Sample ID.	Site Name	O/S Reference	Genetic Sequence	Common Name	Result	Sequence Similarity
B1889	CAMELIA COTTAGE	SV 91981 11538	TATCTATNGGAGNGNTTCGG NACTGNNTGGTNCCTCTGA TAATTGGAGCCCCNGANATA GCATTTCGCCGAATAAATA CATAAGCTTCTGACTTCTCC CCCCATCTTTCTACTANTAT TAGCTTCTCTGCAGTGGAA GCCGGAGCTGGAACCGGTT GAACAGTTTATCCCCCTTTA GCNCGAAACCTGNCNCATG CAGGAG	Brown long-eared bat	<i>Plecotus auritus</i>	85.15%

If you have any questions regarding results, please contact us: ForensicEcology@surescreen.com

Reported by: Chris Troth

Approved by: Gabriela Danickova



Forensic Scientists and Consultant Engineers
SureScreen Scientifics Ltd, Morley Retreat, Church Lane, Morley, Derbyshire, DE7 6DE
UK Tel: +44 (0)1332 292003 Email: scientifics@surescreen.com
Company Registration No. 08950940

METHODOLOGY

Once samples have arrived in the laboratory, a single bat dropping is selected for its suitability (freshness and size). The DNA is then isolated using a commercial DNA extraction kit. Using PCR, bat DNA (if present within the sample) is amplified using bat DNA-specific molecular markers designed to amplify a short fragment of the mitochondrial gene. If amplification is successful, the resulting DNA sequence is revealed using a process known as Sanger Sequencing in order to obtain the genetic sequence. The sequence results are aligned against a library of known bat reference sequences using bioinformatics software, which enables us to determine which species the extracted DNA matches with, informing the species identity and sequence similarity (%).

If the initial analysis is unsuccessful, the entire process is repeated up to two additional times with fresh reserve droppings. If no DNA is detected after three attempts, we can be confident that any further analysis of the sample will likely also fail to result in species identification.

INTERPRETATION

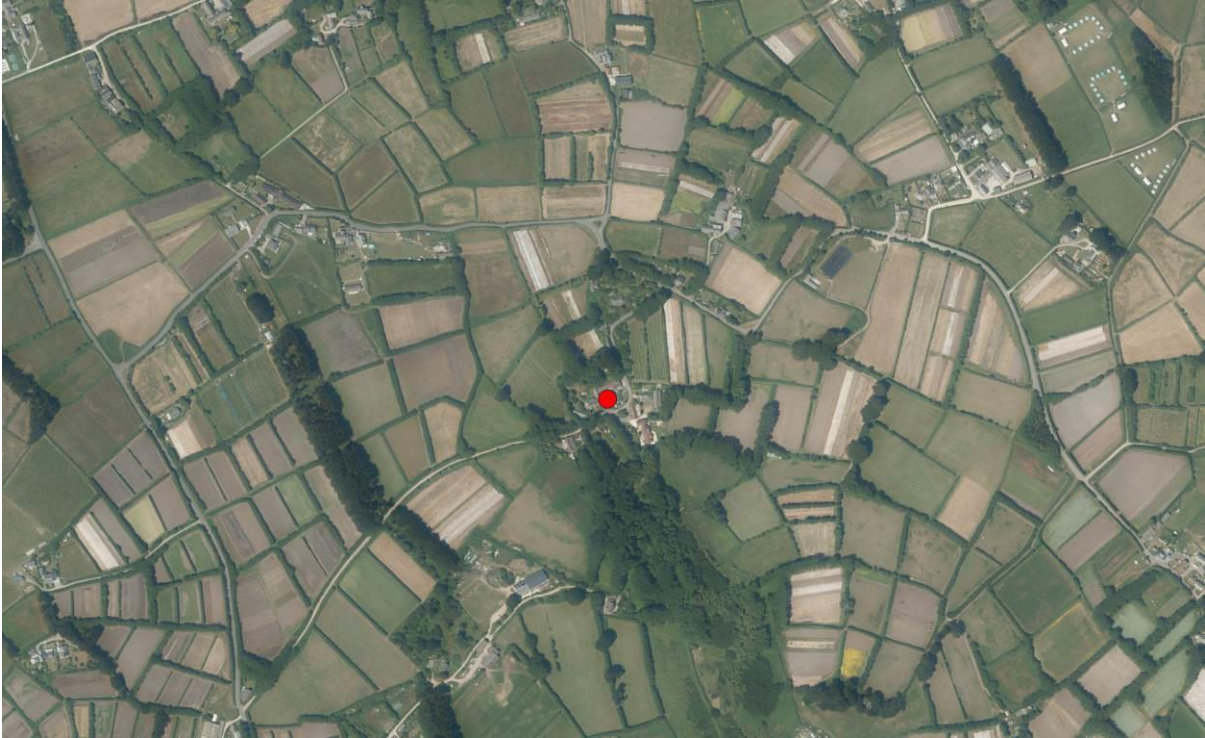
Genetic Sequence:	The unique DNA sequence obtained from the sample.
Sequence Similarity:	How closely matched the DNA sequence from your sample is to the sequences within our reference database. This can be interpreted as a score of result accuracy, with the maximum score of 100% indicating an exact match of dropping to the indicated species' reference sequence. Lower scores (80-99%) indicate some variation between the sample and reference sequence, likely due to natural variation between individual genetic sequences and/or systematic variations generated through the sequencing process. Scores below 80% similarity should be interpreted with care and can indicate part degraded or part contaminated samples.
Inconclusive Result:	<p>Degraded sample: DNA degraded, unable to determine species identification due to degradation of sample DNA. This can happen either before sample collection (old droppings, exposure to UV etc.) or after sample collection if stored for long periods before analysis or not handled correctly.</p> <p>Inhibited/contaminated sample: Unable to determine species identity due to contamination or the suspected presence of large quantities of PCR inhibitors. Contamination sources can come from other species which come into contact with droppings, human contamination during sample collection.</p>
Alternative Result:	Sometimes, other mammalian species such as rodents are detected. We find this to be a common occurrence as some bat droppings can be similar in appearance to rodent droppings. Although sometimes unexpected, repeat analyses in these cases would likely return the same results.



APPENDIX 2

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LOCATION PLAN AND PHOTOGRAPHS



Map 01 – Illustrating the location of the property within the local environs (red circle). Reproduced in accordance with Google’s Fair Use Policy.



Map 02 – Showing the southern pitch of the roof (red wash) on the context of the wider building complex. The flat-roof component which occupies the northern pitch of the roof of Camelia Cottage can be seen to the north. Reproduced in accordance with Google’s Fair Use Policy.



Photograph 1: Showing the front of the building with the bay windows visible.



Photograph 2: Showing the tight fit of the roof tiles and abundant moss. The guttering attachment directly to the wall, without soffit or fascia, can also be seen.



Photograph 3: Showing the timbers which underboard the loft space and also create an internal partition.



Photograph 4: Showing the redundant northern roof structure sealed within the flat-roof extension on the northern aspect of the building. Accessed and visible from the loft space of the property.



Photograph 5: Showing the accumulation of droppings – primarily rat and mouse with individual droppings characteristic of brown long-eared bat – at the western end of the loft space. The confirmed bat dropping was identified suspended in a cobweb immediately above this.



Photograph 6: Showing the concrete wall between Camelia and Magnolia Cottages with minor gaps at the top which a bat could potentially use to access between the loft spaces.

BAT PRESENCE/ABSENCE SURVEYS (PAS)

CAMELIA COTTAGE, HOLY VALE, ST MARY'S, ISLES OF SCILLY



Client: Perry Sladen

Our reference: 23-6-3

Planning reference: Produced in advance of submission

Report date: 26th July 2023

Author: James Faulconbridge BSc (Hons), MRes, MCIEEM

Contact: ios.ecology@gmail.com

Executive Summary

Overview
<p>A suite of surveys were undertaken on Camelia Cottage in order to characterise the use of the property by roosting bats. This followed the results of the Preliminary Roosting Assessment (PRA) undertaken in May 2023. The surveys included:</p> <ul style="list-style-type: none">• 2x Presence/Absence Surveys (PAS);• Passive monitoring of the loft space for 29 days using a static bat detector;• A PRA of the adjacent Magnolia Cottage loft space.
Results
<p>The PAS undertaken in July did not identify any bats emerging from the property. The static bat detector did not identify any bat activity within the loft space. No evidence of roosting bats was identified in Magnolia Cottage loft space.</p>
Conclusion
<p>A single brown long-eared bat dropping was confirmed in the PRA but no further evidence of presence was identified in the further surveys outlined in this report.</p> <p>In accordance with the Precautionary Principle, occasional transient use of roosting opportunities within the loft by an individual brown long-eared bat is assumed.</p>
Mitigation Strategy
<p>In accordance with the precautionary assumption of a roost, a mitigation strategy is provided in the form of a Non-Licensed Method Statement.</p> <p>The Non-Licensed Method Statement is focussed upon the following key principles:</p> <ul style="list-style-type: none">• Avoidance of impacts through pre-commencement inspections; a Toolbox Talk from a Licenced Bat Worker; a Precautionary Method of Works (PMW) strategy; and ecological oversight of selected works;• Mitigation of impacts through the retention of existing access features at the southern eaves of the property and the creation of a sealed void at the eaves which would represent a reduced but retained roosting opportunity for bats;• Enhancement of roosting opportunities through the incorporation of a bat access tile into the roof of the adjacent Magnolia Cottage (under the same ownership as the applicant) and the installation of a Kent Bat Box within the loft space.
Planning Recommendations
<p>A Planning Condition requiring compliance with the Non-Licensed Method Statement outlined in Chapter 4 could be attached to a Decision Notice at the discretion of the LPA.</p> <p>The PRA and PAS reports together provide an appropriate ecological baseline for the purposes of assessing the Planning Application. No further surveys would be required. The results detailed in this report can be considered valid for the current active season. If works have not commenced by March 2024, an update should be undertaken.</p>

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1. Introduction

1.1. Background to Surveys

The building under consideration is Camelia Cottage – a mid-terrace property within Holy Vale in the centre of St Mary’s, Isles of Scilly.

The works subject to the current Planning Application involve the installation of rooflight windows in the southern pitch of the roof. This specific Planning Application is in the context of wider proposals to restore the loft space to residential accommodation. The impact assessment and proposed mitigation strategy will address the full suite of works in order to ensure that the project can take place with legislative compliance on the part both of the Applicant and the Contractor undertaking the works.

A Preliminary Roosting Assessment (PRA) was carried out in June 2023 – this assessment identified an individual brown long-eared bat dropping within the loft space of the property. This was confirmed by DNA analysis.

The PRA report stated that further surveys would be required to provide an evidence base sufficient to characterise the status of the buildings with regards to bats, and inform any mitigation measures required to ensure legislative compliance. These surveys include:

- Two Presence/Absence Surveys (PAS);
- Deployment of a static bat detector within the loft space of Camelia Cottage over the period of a month.
- An internal PRA inspection of the adjacent Magnolia Cottage roof space.

This report provides the results of the recommended surveys and outlines a mitigation strategy informed by the results. It should be read alongside the PRA report to provide a comprehensive assessment of the building with regards to roosting bats.

1.2. Survey Objectives

The overall survey objective is to characterise the use of the Camelia Cottage loft space by bats, specifically brown long-eared bats, and fully assess the potential impacts of the proposals on these species.

- The PAS were undertaken to watch for bats emerging from roost sites within the property at dusk.
- The deployment of the static bat detector within the loft space, immediately adjacent to the location where the dropping was identified, was undertaken to passively monitor the presence of bats in flight within the loft space over the course of a 1-month period from June – July. This

was in order to provide further information on the presence and frequency of bats within the loft space;

- The additional PRA survey of the loft space in Magnolia Cottage was undertaken to provide a comprehensive baseline assessment of features which may be indirectly impacted by the proposed works in the adjacent Camelia Cottage. The PRA survey of Camelia Cottage identified potential for bats to move between these two loft spaces through gaps at the top of the party wall which would be removed and replaced as part of the proposals. The aim of the PRA of Magnolia Cottage was to identify any evidence or potential for use of this loft space by bats.

2. Survey Methodology

2.1. Surveyor Details

The PAS was led by Darren Hart. Darren has undertaken Professional Bat Licence training and is a Level 2 licenced bat worker with experience in undertaking emergence, re-entry and activity surveys.

The static deployment survey and additional PRA were undertaken by James Faulconbridge. James is a Level 2 licenced bat worker with over 15 years' experience in undertaking emergence, re-entry and activity surveys.

2.2. Survey Methodology

2.2.1. PAS

The dusk emergence surveys were conducted following Best Practice methodology for bat surveys.

The dusk emergence surveys commenced from approximately 20 minutes before sunset and continued until 90 minutes after sunset. The survey was undertaken with regard for the appropriate weather conditions ($\geq 10^{\circ}\text{C}$ at sunset, no/light rain or wind).

Frequency division bat detectors were used to detect and record all bat passes. The surveyors recorded metadata including the time the pass occurred, the behaviour observed (foraging/commuting) and where possible, the species of bat observed. Results from the bat detector recordings were analysed using BatSound/Analog sonogram analysis computer software.

2.2.2. Static Deployment

An Anabat Express bat detector was used to passively record any bat passes within the loft space between 22nd June and 21st July 2023. The detector was operated using the standard trigger settings to record from 30 minutes before sunset until 30 minutes before sunrise throughout this period.

The detector was positioned on the gable where the bat dropping was identified, at a height of 1.5m above the floor. This corresponds with the likely flight height of bats within the loft space and therefore maximises the chances of detecting brown long-eared bats which have quiet echolocation characteristics.

The data files were subsequently analysed using AnaLook sound analysis software.

2.2.3. PRA

Both the exterior and interior of Magnolia Cottage were examined for structural features which could potentially support roosting bats or provide access to potential roosting sites.

Potential structural features may include:

- Gaps, crevices and cavities in roof void timbers;
- Lifted areas of sarking, under-felting, roof and wall tiles;
- Gaps in soffits, flashing, barge boards, fascias, cladding, lintels, window/door frames and weather boarding;
- Gaps and cavities in walls.

Close focussing binoculars and a torch were used to assess potential structural features in detail, where required. A search for live bats, bat droppings, urine staining and fur rubbing in and around potential roost sites and access points was undertaken in order to identify the potential presence of roosting bats, or signs of past use.

3. Results

3.1. Presence/Absence Surveys

3.1.1. PAS 1

The first dusk survey was undertaken on 3rd July 2023. The survey commenced at 21:22, approximately 20 minutes before sunset at 21:37. It was completed at 23:07.

The temperature throughout the survey was 17°C. The evening was still, overcast and warm. There was no precipitation throughout the survey.

The survey did not identify any bats emerging from the property. Regular foraging behaviour by common pipistrelle bats was recorded in the vicinity of the property from 22:08 until the end of the survey – this was predominantly offsite to the south and not directly associated with the property itself.

3.1.2. PAS 2

The second dusk survey was undertaken on 18th July 2023. The survey commenced at 21:11, approximately 20 minutes before sunset at 21:26. It was completed at 22:56.

The temperature throughout the survey was 16°C. The evening was still, mild, dry and clear with 20% high cloud. There was no precipitation throughout the survey.

The survey did not identify any bats emerging from the property. Occasional foraging behaviour by common pipistrelle bats was recorded in the vicinity of the property from 21:46 until the end of the survey, but this was relatively low level and not directly associated with the property.

3.1.3. Limitations

The weather conditions during both PAS were optimal with no precipitation or other adverse conditions which might be expected to affect bat behaviour. The two surveys were conducted 2 weeks apart during the key active month of July when brown long-eared bats are in maternity colonies (the highest Conservation Significance in the hierarchy of roost types).

There were restrictions on the ability to observe the property comprehensively as the structure of the building and the adjacent properties preclude direct observation of the northern portion of the roof. However no potential access points for bats were noted on this aspect through an internal inspection; and over 90% of the northern roof pitch (including to the eaves) is taken up by the flat-roof extension of the neighbouring property which is tied into it. This restriction on visibility is not therefore considered to be a significant constraint to survey as it is concluded that the potential access features are situated on the

southern aspect, particularly at the eaves of the property. The passive static detector recording within the roof space provides additional information to address this limitation to visibility.

3.2. Static Bat Detector

3.2.1. Results

The static bat detector was deployed for a total of 29 days from mid-June to mid-July 2023.

No bats were recorded throughout this period.

3.2.2. Limitations

Brown long-eared bats have quiet echolocation characteristics and therefore the lack of records cannot conclusively confirm that no bats were flying within the loft space; however the position of the detector and the confined nature of the space would make it highly unlikely that a deployment of this duration would fail to record any bat passes at all if the loft were regularly used.

The assessment methodology relies upon bats in flight within the loft space and would not necessarily detect evidence of bats roosting in discreet features which were accessed externally; however the nature of the potential roosting opportunities, the behavioural characteristics of the species and the internal dimensions of the roof void would suggest that internal flight would be likely if this were a regular roost.

3.3. Magnolia Cottage – Preliminary Roosting Assessment

3.3.1. Results

The PRA inspection of Magnolia Cottage focussed on the loft space which has the potential to be temporarily disturbed during the removal of the party wall between the two loft spaces, and the creation of a new wall. There is also the potential for the dropping identified within the loft space of Camelia Cottage to be associated with exploratory behaviour from a roost elsewhere within the connected terrace roof voids, potentially including the adjacent Magnolia Cottage.

The loft space of Magnolia Cottage is similar in structure to that of Camelia Cottage, though it does not have the relic northern pitch enclosed within the loft as there is not a flat-roof building tied into this property. There are stone block walls at the gable and up to the eaves, except for the party wall to Camelia Cottage which is breeze block with a concrete render. The roof is supported by timber trusses in good condition with no gaps noted between the timbers and the roof is under-felted throughout.

Evidence of nesting birds was noted, along with both dead sparrows and a dead white-toothed shrew. No evidence of bats was recorded.



Photo 01 – Showing the terminal timber A-frame adjacent to the wall



Photo 02 – Showing the eaves of the loft space



Photo 03 – Showing the timber roof structure with underfelting above



Photo 04 – Showing Magnolia Cottage from the exterior. The southern and western pitches of the roof can be seen.

3.3.2. Limitations

The void was dusty but clear of debris allowing a comprehensive inspection.

3.4. Conclusions

3.4.1. Overview

The surveys did not identify any further evidence of active use of Camelia Cottage by bats during the survey period.

No evidence of bats in the adjacent roof void of Magnolia Cottage was identified.

3.4.2. Assessment and Interpretation

Taking into account the limitations noted, and with due regard to the Best Practice Guidance, it is concluded that there is 'likely absence' of maternity use by brown long-eared bats.

The results cannot conclusively rule out the presence of an occasional, night or transient roost which is used by individual bats on an irregular basis. The confirmation of a single dropping on a cobweb does not confirm the presence of a roost as it could represent exploratory behaviour by an individual bat, especially as the most likely cause of the position of the dropping is a bat in flight. There is the potential that this is related to roosts elsewhere within the terrace building complex, with bats occasionally exploring adjacent voids.

With the application of expert judgement it is considered that the evidence base is proportionate to develop a mitigation strategy in this instance. This is based upon:

- the combined evidence of the suite of PRA, PAS and static monitoring surveys undertaken;
- the ability to avoid the risk of killing/injuring bats; retain a modified roost, and create a new roosting opportunity - thereby securing Continued Ecological Function (CEF) - through an appropriate method of works;
- the proportionality and relative benefit of further survey work which could incur significant additional costs and time delays whilst still resulting in a similarly inconclusive result.

It is not possible to obtain an European Protected Species Mitigation Licence (EPSML) as no roost is confirmed; therefore a Non-Licensed Method Statement can be used to control risk during construction; and secure the provision of roosting features in the long term.

For the purposes of developing this Non-Licensed Method Statement, a precautionary assumption of occasional day/transitional roosting by individual brown long-eared bats is made.

3.4.3. Impact Assessment

The proposed works which are subject to the current Planning Applications relate only to the installation of roof lights within the southern pitch of the property. This action in isolation would modify any roost present through the changes in light levels, and have the potential to kill or injure bats, thereby justifying the Non-Licensed Method Statement in their own right.

The wider scope of works involved in the project however include the conversion of the loft space of Camelia Cottage into residential use. In order to provide a comprehensive assessment of impacts and thereby assure legislative compliance for both the Applicant and Contractor, these works are also taken into account.

With the precautionary assumption of occasional use of the loft space for roosting by an individual brown long-eared bat, the following impacts are identified:

- Uncontrolled works could result in killing/injuring individual bats bat if they were present in the loft space at the time of works;
- In the absence of mitigation, the works would result in the modification of a roost (through installation of the roof light windows) and the destruction of a roost (through the internal remodelling works proposed).

The non-licenced method statement provided in Section 4 of this report will outline measures to avoid, minimise and mitigate these impacts. Further enhancement will also be provided.

4. Mitigation Strategy

4.1. Avoidance of Impacts: Precautionary Method of Works

4.1.1. Overview

A Precautionary Method of Works (PMW) would be required in order to ensure that bats are not harmed during works, in the unlikely event of their presence.

4.1.2. Timing of Works

The times of year when bats are most susceptible to disturbance are typically the maternity season (from mid-May to early-Sept) and the hibernation season (Dec to Feb inclusive). Works should not commence during these time periods as an additional precaution.

Works should be targeted to the transitional periods:

- Mid-March to mid-May
- Mid-September to end-November

Works commenced during these timeframes can continue into the more sensitive summer and winter periods provided that there is regular contractor presence/disturbance which would deter bats from establishing roosts, or the potential roosting sites are otherwise made unsuitable by the works undertaken to date.

4.1.3. Pre-commencement Inspection

A Licenced Bat Worker would inspect the roof space prior to the commencement of works. Once it is confirmed that no bats are present, works can proceed.

If a bat is identified, works would not commence until an EPSML was secured to ensure the works can proceed with legislative compliance.

4.1.4. Toolbox Talk

The Licenced Bat Worker (LBW) would provide a Toolbox Talk to the Contractor at the commencement of the project. This would include the following details:

- An introduction to bats;
- What evidence of bats might look like;
- How bats use buildings, with a focus on the features which could be used in Camelia Cottage;
- The legal protection of bats and their roosts;
- The precautionary method of working developed for the project;

- What to do if a bat is found or suspected.

4.1.5. Precautionary Method of Works

The following initial aspects of the works would be subject to a soft-strip methodology to ensure that, in the unlikely event of bats being present, they are not harmed or injured.

Provided the contractor has received the Toolbox Talk and the LBW is satisfied that they are competent and confident to proceed, these works can proceed under distance supervision. If there is any uncertainty, the works would be supervised by the LBW as a precaution:

- **Tiles around the locations where the new roof lights would be installed.**

These would be lifted carefully and by hand in such a way that, if a bat were present beneath, they would not be crushed or otherwise harmed by the action. Tiles should be inspected carefully underneath for bats clinging to the underside before being set aside.

- **Internal timber boarding.**

These would be removed by hand and the rear of the boards inspected for bats clinging to the underside. The exposed roof above would be carefully inspected to ensure bats are not present before continuing;

Once these actions are complete, works could then proceed under Distance Supervision.

4.1.6. Bat Encounter

If bats are identified or suspected at any time, works would cease and the LBW contacted immediately for advice.

- If the bat is in a safe situation, or a situation which can be made safe, they should remain undisturbed.
- Only if the bat is in immediate risk of harm can the bat be moved with care and using a gloved hand. This is a last resort and should only be undertaken for humane reasons if the bat is at immediate risk of harm and if the LBW cannot be contacted for advice.

4.2. Mitigation of Impacts: Roost Retention

4.2.1. Retention of Eaves Access

The existing access features which permit bats to enter the southern pitch of the Camelia Cottage roof void at the eaves would be retained. There is no requirement to install additional or alternative access features.

The final layout of the re-modelled loft space would retain an enclosed void at the eaves separated from the living space – see Figure 01. This would continue to be accessible to bats in the long term to provide continuity of roost provision in the same location.

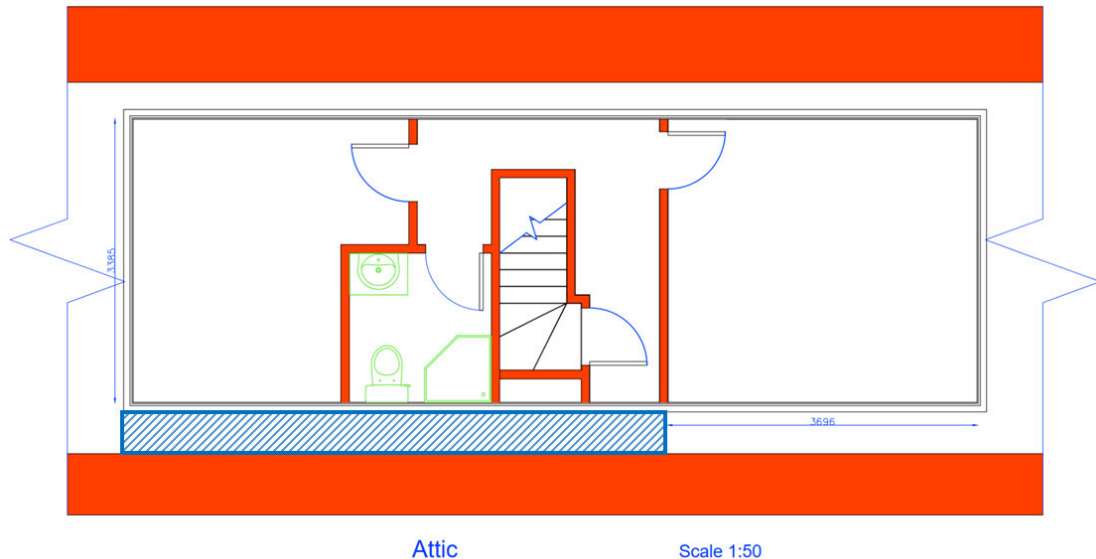


Figure 01 – Showing the location of the sealed void (blue hatch) which would be retained as a specific bat roost. This is directly accessed through the identified access features on the southern eaves of the property, thereby retaining a reduced roost void in situ.

The reduction in the available space within the loft would reduce the suitability of the roof as a roosting space for larger colonies of bats, however the results of the suite of surveys are sufficient to conclude 'likely absence' of a maternity colony. The retained eaves space is likely to remain suitable for use by individual brown long-eared bats.

Breathable roofing membranes (BRMs) are not suitable for locations where bats might come into contact with them. Over time, their condition and breathability is negatively affected by bats, and their deterioration can result in entanglement and killing of bats. For this reason, Natural England do not permit any BRMs to be used in confirmed roosts.

If there is a requirement to replace or install roofing membranes in the sealed eaves void on the southern roof pitch, these would be bitumen or similar. This applies only to the sealed void and does not apply to the wider roof as this would not be suitable for use by roosting bats after the conversion works are complete.

This eaves void would remain sealed and should not be used for storage or other uses in order to ensure that it remains suitable for use as a roosting space by bats. It would not include an internal access hatch in order to secure this.

4.3. Enhancement: Roost Creation

4.3.1. Access to Magnolia Cottage Loft Space

Magnolia Cottage is a holiday let which is immediately adjacent to Camelia Cottage on the eastern aspect. It is under the same ownership as Camelia Cottage and the party wall in the loft space between the two properties would be removed and reinstated in a new position as part of the works.

Following completion of works, the remaining loft space of Magnolia Cottage would not be modified or used for residential purposes. The construction, condition and aspect of the loft space, in close proximity to Camelia Cottage, would make an ideal location for alternative roost creation.

The key aspect of the enhancement would be to introduce a bat access feature to the loft space. This would be on the western aspect of the roof, close to the eaves in order to secure a sheltered fly-out for bats. The Leadworx Bat Access Tile has been demonstrated to successfully provide an access to roof spaces for bats and is the preferred model. Similar products could be used subject to agreement with the LBW. A small cut in the retained roofing membrane would be required to allow bats to access the roof void through the newly created access feature. The Bat Access Tiles are designed to allow access to bats, whilst maintaining the weatherproof nature of the roof itself, thereby ensuring the roof is not compromised.



Photo 05 – Showing an example of the bat access feature which would be installed. This model is the Leadworx Bat Access Tile but similar products could be used subject to agreement with the LBW.



Photo 06 – Showing the approximate location where the bat access tile would be installed in the western pitch of Magnolia Cottage (white arrow).

4.3.2. Bat Box

Brown long-eared bats are confirmed to use the Kent Bat Box design for roosting. One box would be installed within the loft space of Magnolia Cottage at the completion of works, when there would be no further disturbance from construction in the adjacent property.

The box would be situated at a height of >1.5m on one of the interior gable walls to ensure a good fly-in access. It should be securely fastened to the wall to ensure long-term stability.

A suitable box could be purchased or constructed following freely available plans. Kent Bat Box style boxes are slim and easy to construct from appropriate timber using the plans provided at:

<http://www.kentbatgroup.org.uk/kent-bat-box.pdf>

4.4. Survey Validity and Update

The surveys were completed between June – July 2023. Bats can change their use of roosts within and between years, and apparently minor changes in condition or use of the building can affect suitability. Given that a brown long-eared dropping was confirmed in the PRA survey in June 2022, it is considered that the survey baseline outlined in this report is valid for an application during the current active season only.

If works have not commenced by **March 2024**, an update survey should be undertaken to ensure that the ecological baseline remains appropriate to inform the impact assessment and mitigation strategy.

4.5. Planning Conditions

It is recommended that the following requirements should be incorporated into appropriate Planning Conditions if the LPA are minded to approve the application:

- A compliance condition requiring that works proceed with regards to Mitigation Strategy outlined in **Chapter 4** of this report.